



**FINAL ADMINISTRATIVE DECISION
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANTS: Adivaraha & Soumya Jayasankar
DOCKET NO.: 16-01157.001-R-1
PARCEL NO.: 07-01-09-313-004-0000

The parties of record before the Property Tax Appeal Board are Adivaraha & Soumya Jayasankar, the appellants, by Jessica Hill-Magiera, Attorney at Law in Lake Zurich; and the Will County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **no change** in the assessment of the property as established by the Will County Board of Review is warranted. The correct assessed valuation of the property is:

LAND: \$47,070
IMPR.: \$145,230
TOTAL: \$192,300

Subject only to the State multiplier as applicable.

Statement of Jurisdiction

The appellants timely filed the appeal from a decision of the Will County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2016 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

Findings of Fact

The subject property is improved with a two-story dwelling of frame construction with 3,244 square feet of living area. The dwelling was constructed in 2000. Features of the home include a full finished basement, central air conditioning, a fireplace and an attached garage with 646 square feet of building area. The property has a 12,500 square foot site and is located in Naperville, Wheatland Township, Will County.

The appellants contend overvaluation and assessment inequity as the bases of the appeal. In support of the overvaluation argument, appellants' attorney submitted limited information on ten comparable properties located within .43 miles of the subject property. The comparables consist of two-story dwellings ranging in size from 2,984 to 3,566 square feet of living area constructed in 2000 or 2001. Each comparable has a full basement, central air conditioning, one fireplace and a garage ranging in size from 483 to 799 square feet of building area. Appellants' attorney did

not disclose the lot size, exterior construction or basement finish of the comparables presented on the grid analysis. The sales occurred from June 2015 to December 2016 for prices ranging from \$421,100 to \$515,000 or from \$118.15 to \$153.43 per square foot of living area, land included. Based on these sales, the appellants requested the subject's assessment be reduced to \$157,162, reflecting a market value of \$471,486 or \$145.34 per square foot of living area, land included.

With respect to the assessment equity argument, the appellants provided limited information on 64 comparable properties improved with two-story dwellings ranging in size from 2,920 to 3,562 square feet of living area. The dwellings were constructed from 2000 to 2003. Each comparable has a full basement. No information was provided regarding basement finish or features such as central air conditioning, fireplaces or garage size. These properties are located in the same subdivision as the subject property and have improvement assessments ranging from \$105,153 to \$131,749 or from \$34.29 to \$38.27 per square foot of living area. Based on this evidence, the appellants requested the subject's assessment be reduced to \$110,092 or \$33.94 per square foot of living area, land included.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$192,300. The subject's assessment reflects a market value of \$578,172 or \$178.29 per square foot of living area, land included, when using the 2016 three-year average median level of assessment for Will County of 33.26% as determined by the Illinois Department of Revenue. The subject property has an improvement assessment of \$145,230 or \$44.77 per square foot of living area.

In support of its contention of the correct assessment the board of review submitted information on five comparable sales consisting of two-story dwellings of frame construction that range in size from 3,150 to 3,466 square feet of living area. The dwellings were built from 2001 to 2004. Each comparable has a full basement, three with finished area, central air conditioning, a fireplace, and a garage ranging in size from 712 to 1,020 square feet of building area. The comparables are located within .07 to .68 miles of the subject property and have the same subarea classification as the subject. The sales occurred from June 2015 to August 2016 for prices ranging from \$580,000 to \$612,500 or from \$168.78 to \$194.44 per square foot of living area, land included. The board of review also disclosed that appellants purchased the subject property in August 2014 for \$575,000 or \$177.25 per square foot of living area, land included.

In support of the assessment equity argument, the board of review provided information on five equity comparables located within .78 miles of the subject property and having the same subarea classification as the subject. The comparables are improved with two-story dwellings of frame construction built from 2000 to 2003 and ranging in size from 3,226 to 3,321 square feet of living area. Each comparable has a full finished basement, central air conditioning, one or two fireplaces, and a garage ranging in size from 632 to 1,020 square feet of building area. These properties have improvement assessments ranging from \$148,597 to \$152,464 or from \$45.02 to \$46.76 per square foot of living area.

In addition to their grid analyses, the board of review submitted a brief stating that the subject is located in a very large subdivision containing approximately 940 homes. Some of the homes are located on or near very busy thoroughfares. Due to their proximity to these higher traffic volumes, these homes generally have lower assessed values and have been placed in the T07

subcategory within the subdivision. The subject property is in the T10 subcategory which is not located near such busy thoroughfares. The board of review also provided additional information pertaining to appellants' comparables such as only three of appellants' comparables have finished basements, like the subject, but did not specify which three comparables those were.

Based on this evidence, the board of review requested no change in the subject's assessment.

The appellants' counsel submitted rebuttal comments indicating that each of the comparable sales provided by the board of review was acceptable and further asserting that board of review comparable sales #3 and #4 support a reduction. Counsel further posited that the best comparable sales in the record are appellants' comparables #2, 3, 4, 6, 7, 8, 9 and 10, along with the five board of review comparables.

Conclusion of Law

The appellants asserted in part that the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellants did not meet this burden of proof and no reduction in the subject's assessment is warranted.

The parties submitted 15 sales comparables for the Board's consideration, along with evidence that the subject property was purchased in August 2014 for \$575,000. The Board gave less weight to appellants' comparables since appellants' counsel did not disclose salient information regarding the comparables such as their basement finish or other features such as central air conditioning, fireplaces or garage size for a meaningful comparative analysis. The Board gave less weight to board of review comparable #2 due to its much larger garage size when compared to the subject. The Board finds substantial evidence of market value in the remaining four board of review comparables, which is further supported by August 2014 purchase of the subject property for \$575,000. The four board of review comparables, which were similar to the subject in location, design, age, size and most features, sold from June 2015 to August 2016 for prices ranging from \$580,000 to \$612,500 or from \$168.78 to \$194.44 per square foot of living area, land included. The subject's 2016 assessment reflects a market value of \$578,172 or \$178.29 per square foot of living area, land included, which falls within the range established by the subject's 2014 purchase price and the board of review's four best comparable sales. The Board notes the August 2014 purchase of the subject property for \$575,000 hardly gives credence to a reduction to an estimated market value of \$417,486 for the 2016 tax year. After making adjustments to the comparables for some differences when compared to the subject, the Property Tax Appeal Board finds no reduction in the subject's assessment is warranted on the grounds of overvaluation.

The appellants also contend assessment inequity with respect to the improvement assessment as a basis of the appeal. Taxpayers who object to an assessment on the basis of lack of uniformity bear the burden of proving the disparity of assessments by clear and convincing evidence. 86 Ill.Admin.Code 1910.63(e). After an analysis of the assessment data, the Board finds the

appellants have not met this burden and no reduction in the assessment is warranted on the grounds of lack of uniformity.

The parties provided 69 equity comparables for consideration by the Board. These comparables have varying degrees of similarity to the subject but overall were similar in style, size and age. These properties have improvement assessments that range from \$34.29 to \$46.76 per square foot of living area. The subject property has an improvement assessment of \$44.77 per square foot of living area, which is within the range established by the numerous comparables submitted in the record. Based on this evidence, the Property Tax Appeal Board finds that a reduction in the subject's improvement assessment is not justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.

Chairman



Member



Member

Member



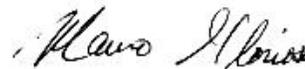
Member

DISSENTING: _____

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: October 15, 2019



Clerk of the Property Tax Appeal Board

IMPORTANT NOTICE

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois
Property Tax Appeal Board
William G. Stratton Building, Room 402
401 South Spring Street
Springfield, IL 62706-4001

APPELLANT

Adivaraha Jayasankar, by attorney:
Jessica Hill-Magiera
Attorney at Law
790 Harvest Drive
Lake Zurich, IL 60047

COUNTY

Will County Board of Review
Will County Office Building
302 N. Chicago Street
Joliet, IL 60432